

**AFFIDAVIT IN SUPPORT OF APPLICATION
FOR A SEARCH WARRANT FOR ONE U.S. MAIL PARCEL**

Your Affiant, Douglas Henegar, United States Postal Inspector, Baltimore, MD, being
duly sworn, hereby deposes and states as follows:

FILED _____ ENTERED _____
LODGED _____ RECEIVED _____

NOV 1 2013

I. Subject Parcels.

This is an Affidavit submitted in support of an Application ^{AT BALTIMORE} ~~CLERK U.S. DISTRICT COURT~~ ^{DEPUTY} for one
~~BY~~ ^{DEPUTY}
(1) subject U.S. Mail Parcel, hereinafter "Subject Parcel," or "SP." This Subject Parcel is
currently located at the Incoming Mail Facility, in Linthicum Heights, Maryland. This subject
parcel is specifically identified as follows:

<i>Subject Parcel</i>	<i>Express (E) or Priority (P) and Tracking ID number</i>	<i>From: Name and Address</i>	<i>To: Name and Address</i>
1.	(E) EI777968280US	Martha William 1128 Monroe Ave Las Vegas, NV 89106	Birthday Party for Katie 47907 Jordan Park Blvd. Forestville, MD 20747

II. Affiant's Training and Experience

2. Your Affiant, Douglas Henegar, has been a United States Postal Inspector since April 2012 and has completed 12 weeks of basic investigative training, which included the investigation of narcotics related offenses. Your Affiant routinely investigates the use of the U.S. Mail to ship narcotics and narcotics proceeds to and from the Baltimore/Washington area from the known narcotic source areas of Florida, Georgia, California, Arizona, Texas and Colorado (among others). As a result of your Affiant's training and experience, your Affiant is aware that Express Mail and Priority Mail services are regularly used by narcotics traffickers to ship controlled substances and bulk cash through the U.S. Mail.

3. Based upon my training and experience in the field of narcotic interdiction

through the mails, I know that there are suspicious characteristics common to many packages that contain narcotics and controlled substances. These factors, more fully detailed below, are used as a pointer system to identify packages requiring further investigation. It is the totality of the characteristics that create reasonable suspicion prior to presenting a parcel to a canine for examination. In the case of these warrants, each parcel presented with several of these factors, and was also alerted to by the canine. While there are many characteristics that experienced inspectors look for, the most common factors or suspicious characteristics routinely observed in the course of screening packages are as follows.

a. *Contrasts observed between legitimate business parcels and drug parcels:*

As an alternative to First Class Mail (which does not provide a customer with the capability to track the progress of a parcel through the system), the U.S. Postal Service offers Express Mail and Priority Mail. Express Mail is guaranteed (money back) to be delivered on a set date and time, usually overnight. (That deadline is determined at the time of mailing.) The customer receives a receipt with this guaranteed information, and the sender can opt for a signature requirement at the other end or not. Customers can track the parcel on line by its distinct Express Mail tracking number. The weight of the package and the distance traveled are the two main factors in setting the price. Express Mail costs more than Priority Mail. Priority Mail has a delivery service standard of 2-4 business days, but delivery within that time period is not guaranteed. Priority is a less expensive alternative to Express, but still provides the ability to track a parcel. Legitimate businesses using Express Mail typically have a business or corporate account visible on the mailing label, which covers the cost of the mailing. In contrast, the drug distributor will pay for the cost of mailing the package at the counter by using cash or a credit card. Business Express Mail parcels typically weigh no more than 8 ounces, and business

Priority Mail parcels typically weigh no more than 2 pounds. Drug packages typically exceed these weights. Address labels on business parcels are typically typed, whereas those on drug packages are typically hand written. In your affiant's experience, it is fairly easy to separate out smaller parcels, which constitute 70% to 80% of all Express and Priority Mail parcels, from other, heavier parcels. Typically, drug traffickers use Express mail, and will opt out of the requirement of obtaining a signature upon delivery.

b. *Invalid Sender/Return Address:* When drugs are shipped through the mails, the senders generally do not want them back. To distance themselves from parcels containing drugs, often the return addresses and the names of senders are fictitious or false. A fictitious or false address is anything from an incorrect zip code, to a non-existent house number or street. The name of the sender is also typically invalid in one of several ways. Your affiant has seen packages sent by persons with names of celebrities, cartoon characters, or fictional persona. More often a search of the *Accurint* database reflects that there is no association between the name of the sender, and the address provided.

c. *Invalid Recipient/Address:* It would be counter-productive to put the wrong receiving address on a package, but often the named recipient is not actually associated with the receiving address. This provides plausible deniability to anyone receiving the package to as to their knowledge of its contents. Sometimes drug packages are addressed to vacant properties with the expectation that the postal carrier will just leave it at the address. The intended recipient will then retrieve it from that location and hope to remain anonymous.

d. *Location of Sender:* The fact that a package was sent from narcotics source states such as Arizona, California, Colorado, and Florida can also indicate that the parcel contains controlled substances.

e. *Smell:* The odor of cocaine, marijuana, and methamphetamine are distinct, and through experience postal inspectors are familiar with these odors. On occasion, a parcel will emit an odor that is easily recognized without the assistance of a canine. (Again, this is only a pointer.) Other smells that suggest that a parcel may contain narcotics include the aroma of masking agents. Common masking agents used in an attempt to thwart detection by law enforcement and canines typically include dryer sheets, coffee, mustard, and any other substance that releases a strong smell.

f. *Heavy Taping:* Heavily taped parcels are another factor that will suggest a drug parcel, because narcotics parcels are heavily taped in an effort to keep the smell inside and to forestall easy checking on the interior contents by lifting up a flap. For this reason, your affiant has also observed excessive glue on the flaps of narcotics parcels as well.

4. It is your affiant's experience that when these factors are observed, a canine hit will follow. As a result, these factors become a reliable way to profile the parcels being shipped every day.

5. The facts contained in this affidavit are based on my personal knowledge as well as that of the other agents involved in this investigation. All observations that were not made personally by me were related to me by persons with knowledge. This affidavit contains that information necessary to establish probable cause to support an application for a search warrant. This affidavit is not intended to include each and every fact and matter observed by or made known to agents of the government.

III. Probable Cause

6. The following factors or suspicious characteristics are present regarding the subject parcel:

Subject Parcel (E/P)	Weight	FROM invalid name or address?	Other?
From Source Area ?	Label	TO invalid name or address?	Canine Alert?
1 – Express	5 lbs 10 oz	Does not associate with this address	¹ Hunter
Yes	Handwritten	Does not associate with this address	Yes

7. After agents observed the suspicious characteristics listed above, a drug detection dog named Hunter scanned the suspect parcel and “alerted,” indicating that he detected the presence of narcotics. Standard protocols for canine detection were followed. Specifically, on October 3, 2013, this date, your Affiant placed the subject parcel identified herein in a secured area among other inert boxes at the Incoming Mail Facility, Linthicum Heights, Maryland. At that time, the narcotic detection canine identified herein was brought in to search the area. The dog’s law enforcement handler observed the canine and then informed your Affiant that the dog alerted on the subject parcel which was hidden among the other boxes. Your Affiant also observed the canine alert on the subject parcel.


IV. Conclusion

8. Your affiant submits that based upon the above indicators reflected in the Subject Parcel described herein, based upon my training and experience, and based upon the alert of a trained canine on the package, I believe there is probable cause that the above-described subject

¹ “Hunter” was last certified in December of 2012 to alert on odors of ecstasy (MDMA), cocaine, heroin, and marijuana (THC) and is trained on a monthly basis to ensure his accuracy. Baltimore City Police Detective Norman Shifflet is the handler for “Cyrus.” As of October 1, 2013, Hunter had alerted on 342 parcels, 307 of which positively contained narcotics, and 9 which positively contained bulk US currency.

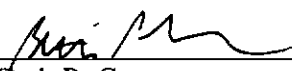
parcel contains narcotics or controlled substances and/or materials relating to the distribution of controlled substances through the United States Mail.

Respectfully submitted,



Douglas Henegar
United States Postal Inspector

Subscribed and sworn to before me this 3rd day of October, 2013.



Beth P. Gesner
United States Magistrate Judge

13-2372BPG

ATTACHMENT A

DESCRIPTION OF PARCELS TO BE SEARCHED

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